

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Cheryl A. Roach and David A. Roach

: NO. 19-13509 AMC

: CHAPTER 13

Response to Motion for Relief filed by Flagstar Bank NA

Debtors, by and through their attorney, responds as follows:

1-5. Admitted.

6-9. Denied. Movant has miscalculated the amount due. Debtors will be current by the time of the hearing or shortly thereafter. Movant is adequately protected and the real estate is necessary for a successful reorganization.

WHEREFORE, it is respectfully requested that the Motion be DENIED.

By: /S/Michael P. Kelly